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Hearing Date: January 19, 2001
Time: 10:00 AM

Attorneys for Chinatrust Bank (U.S.A.) and Chinatrust Commercial Bank (New York Branch)

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	Case Nos. 00-41065
	:	through 00-41196 (SMB)
RANDALL'S ISLAND FAMILY GOLF	:	
CENTERS, INC., <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors.	:	
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JOINDER BY CHINATRUST BANK (U.S.A.) AND CHINATRUST COMMERCIAL BANK (NEW YORK BRANCH) WITH THE LIMITED OBJECTION OF NON-PRIMED PREPETITION LENDER CROWN LIFE INSURANCE COMPANY TO THE DEBTORS' MOTION FOR AN ORDER PURSUANT TO SECTIONS 105, 363, 365 AND 1146 OF THE BANKRUPTCY CODE AND BANKRUPTCY RULES 2002, 6004, 6006 AND 6007 AUTHORIZING, INTER ALIA, THE ASSUMPTION AND ASSIGNMENT OF CERTAIN LEASEHOLD INTERESTS, APPROVING THE FORM OF SALE AND ASSIGNMENT AGREEMENT, APPROVING THE SALE OF PERSONAL PROPERTY AND LEASEHOLD INTERESTS FREE AND CLEAR OF LIENS, AND RELATED RELIEF

TO: THE HONORABLE STUART M. BERNSTEIN,
UNITED STATES BANKRUPTCY JUDGE

Chinatrust Bank (U.S.A.) and Chinatrust Commercial Bank (New York Branch), by and through their attorneys, Wong Fleming, P.C., pursuant to 11 U.S.C. §105, hereby joins in the *Limited Objection of Non-Primed Prepetition Lender Crown Life Insurance Company*

(“Crown”) to the Debtors' Motion for an Order Pursuant to Sections 105, 363, 365 and 1146 of the Bankruptcy Code and Bankruptcy Rules 2002, 6004, 6006 and 6007 Authorizing, Inter Alia, the Assumption and Assignment of Certain Leasehold Interests, Approving the Form of Sale and Assignment Agreement, Approving the Sale of Personal Property and Leasehold Interests Free and Clear of Liens, and related relief and respectfully represent:

1. Chinatrust Bank (U.S.A.) (“CTB”) and Chinatrust Commercial Bank (New York Branch) (“CTCB”) are both “Pre-Petition Non-Primed Lenders” under the terms of this Court’s June 2, 2000 Order.

2. On January 16, 2001, the Debtors filed a motion to approve the sale of certain fee-owned properties and for related relief (Docket Sheet No. 671) (the “Sale Motion”).

3. CTB and CTCB are lien creditors with rights on all real and personal property located at the Debtors’ golf facilities in (a) Kent, Washington, (b) Maineville, Ohio, (c) Richmond, Virginia, (d) Atlanta, Georgia, and (e) Denver, Colorado. Accordingly, both CTB and CTCB possess credit bid rights for the proposed sale of personalty and realty and they object to these bidding procedures because they fail to preserve those credit bid rights.

4. Chinatrust Bank (U.S.A.) and Chinatrust Commercial Bank (New York Branch) are secured creditors, similarly situated as Crown; therefore, Chinatrust Bank (U.S.A.) and Chinatrust Commercial Bank (New York Branch) are entitled to the same relief and consideration as Crown.

5. Chinatrust Bank (U.S.A.) and Chinatrust Commercial Bank (New York Branch) hereby join in all of the objections set forth in the Limited Objection of Crown.

6. Given the extraordinary time limitations which the Debtors seek to impose on this process, Chinatrust Bank (U.S.A.) and Chinatrust Commercial Bank (New York Branch) reserve the right to raise additional objections, and to join in any objections which other creditors or parties in interest may raise, in response to the Sale Motion. Chinatrust Bank (U.S.A.) and Chinatrust Commercial Bank (New York Branch) also request that they be afforded the benefit of any relief which the Bankruptcy Court may award in response to an objection filed by another similarly situated creditor.

CONCLUSION

WHEREFORE, Chinatrust Bank (U.S.A.) and Chinatrust Commercial Bank (New York Branch) join in the Limited Objection of Crown Life Insurance Company to Debtors' Motion Authorizing, Inter Alia, the Assumption and Assignment of Certain Leasehold Interests, Approving the Form of Sale and Assignment Agreement, Approving the Sale of Personal Property and Leasehold Interests Free and Clear of Liens, and related relief, and are entitled to the same relief as Crown Life Insurance Company.

Dated: Edison, New Jersey
January 18, 2001

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By: /s/ Daniel C. Fleming
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